

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ANDREW AND LAUREN HACKNEY,

CIVIL DIVISION

Plaintiffs,

v.

2:24-cv-00472

ALLEGHENY COUNTY et al.,

Defendants.

**DEFENDANTS' CONSENT MOTION TO CONSOLIDATE DEADLINES FOR
FILING A RESPONSIVE PLEADING TO PLAINTIFFS' COMPLAINT**

Defendants, through undersigned Counsel, file this CONSENT MOTION TO CONSOLIDATE DEADLINES FOR FILING A RESPONSIVE PLEADING TO PLAINTIFFS' COMPLAINT for the reasons set forth below:

1. Plaintiffs initiated this lawsuit in the Court of Common Pleas of Allegheny County, Pennsylvania.
2. Defendants then removed the action to this Honorable Court on March 28, 2024. (ECF No. 1).
4. All Defendants represented by undersigned Counsel have now received and completed waivers of service. (ECF No. 3-8).
5. As a result of receiving waivers of service on different dates, there are groups of Defendants that have differing responsive pleading deadlines of June 7th and July 1st. (ECF No. 1-8).
6. Given the differing deadlines, Defendants respectfully request that this Honorable Court consolidate the date for filing a responsive pleading to July 1, 2024, for all Defendants.
7. Plaintiffs have consented to this consolidated deadline for Defendants to file a responsive

pleading.

WHEREFORE, Defendants, through undersigned Counsel, respectfully request that this Honorable Court consolidate the deadlines for filing a responsive pleading to July 1, 2024.

Respectfully submitted,

/s/ Frances Liebenguth

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